



March 30, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Clerk

South Carolina Public Service Commission
Columbia, South Carolina 29211

Attorneys at Law

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RE: Application of R & M Charlotte, LLC d/b/a Two Men and A Truck of Charlotte
to Amend Tariff, **Docket No. 2020-284-T**

Dear Jocelyn:

I represent R&M Charlotte, LLC d/b/a Two Men and a Truck of Charlotte (“Two Men and a Truck of Charlotte” or the “Company”). Please allow this letter to serve as a Petition for Rehearing or Reconsideration, under Commission Rule 103-854, of that portion of the Commission Directive in this Docket dated March 10, 2021 denying the Company’s request to “implement a maximum variable-type rate tariff” because that tariff “may not prevent customer discrimination.”

Mindful and appreciative that the Commission intends to consider allowing a maximum rate tariff “as a general matter at a later date,” the Company wants to point out how its proposal offers substantial benefits for customers, and assure the Commission that no customer discrimination would take place.

First, a maximum rate is a ceiling that would only allow the Company flexibility to provide moves at prices below that maximum rate. For example, if the customer agrees to move on one of the traditionally “slower” moving days of the week (e.g. Tuesday), then the Company could adjust the rate. Likewise, a customer who moves during the “slower” times of the year (outside the peak moving season) might also receive an appropriate rate. A maximum rate framework would allow the Company to meet the offer of a competitor, and allow market competition to benefit the customer. The above scenarios benefit customers, as the Company would be providing moving services at rates *below* the maximum rate.

Similarly, absent a maximum rate structure with the ability to adjust prices below that maximum, no customer could benefit from a lower rate. Also, customer pricing flexibility below a maximum rate (or without a maximum rate altogether) has been granted by the Commission for long distance and local exchange telecommunications carriers. *See* Order No. 98-165 in Docket No. 97-467-C and Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C.

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The Company knows it would be the first household goods moving company regulated by the Commission to operate with a maximum rate structure. Two Men and a Truck of Charlotte does not object to any other carrier operating in a similar way.

Finally, to ensure that no customer discrimination takes place, the Company commits that it will communicate to customers all available pricing flexibility options. The Company (or its affiliates) has been operating under a maximum rate tariff for its operations in North Carolina and Georgia for many years, and can attest to the fact that customers benefit greatly from the pricing such a structure provides.

The Company requests that the Commission grant rehearing or reconsideration and allow Two Men and a Truck of Charlotte to implement a maximum rate structure, and grant such other relief as is just and proper.

Sincerely,

s/ John J. Pringle, Jr.

John J. Pringle, Jr.

JJP/vmc

cc: Mr. Tripp Moore (via electronic mail service)